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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW; Room TW-A325
Washington, D C. 20554

Re SBC/Ameritech Merger Order, CC Docket No. 98-141

Dear Ms. Dortch:

At the request of the Wireline Competition Bureau of the Competition Policy Division, SBC Communications Inc (SBC) is filing the attached letter sent to Carol Matthey, Deputy Chief, Wireline Competition Bureau on July 25, 2003. The attached letter requests the staff approval to move the implementation date of the 3.0 Texas Business Rules, PM 5a and 12c disaggregations, concurrent with the implementation date as the other disaggregations in the approved implementation schedule¹.

Sincerely,

A handwritten signature in black ink, appearing to read "D. G. Cartwright".

Attachment

CC: William Dever, WCB
Dennis Johnson, WCB
Pete Young, EB

¹ See Letter from Carol E. Matthey, Deputy Chief Wireline Competition Bureau, to Michelle A. Thomas, Executive Director-Federal Regulatory, SBC Telecommunications, Inc, CC Docket No. 98-1414 (filed July 14, 2003). The Texas Business Rules only apply to Ameritech and SNET. California and Nevada follow the California Business Rules.

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FEDERAL COMMUNICATIONS COMMISSION
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Ms. Carol E. Matthey
Deputy Chief
Wireline Competition Bureau
Federal Communication Commission
445 Twelfth Street, S.W., Room 5C-451
Washington, DC 20554

RE: SBC/Ameritech Merger Order. CC Docket No. 98-141

Dear Ms. Matthey:

SBC Communications Inc. (SBC) respectfully requests the Wireline Competition Bureau (WCB) approve moving the scheduled implementation dates for some submeasures of the Version 3.0 Texas Business Rules for PMs 5a and 12c in the SBC Midwest region. SBC requests permission to implement these disaggregations concurrent with all other new disaggregations in the previously approved SBC Midwest implementation schedule.

On October 17, 2002, the Texas Commission updated the SBC's Texas 271 performance measurements (PMs). Subsequently, SBC filed 3.0 PM Business Rules and Implementation Schedules for SBC Midwest and SBC SNET with the WCB on March 13, 2004. On July 14, 2003, the WCB granted SBC's request to apply the 3.0 Texas Business Rules effective February 1, 2003.

Per the previously approved implementation schedule, SBC agreed to implement the parity/benchmark comparison changes for measures 5a and 12c in the SBC Midwest region by the June 20th filing. During implementation, SBC Midwest discovered that for a subset of the total changes that were initially thought to be simply parity/benchmark comparison changes, were in fact PMs that required creating new disaggregations and therefore require additional programming.¹ In the approved implementation schedule, all new disaggregations are to be implemented in September 2003. Therefore, with your approval, SBC Midwest would like to move the implementation date for the following subset of PM 5a and PM 12c disaggregations to the same September 2003 date as the other measures with new disaggregations.

¹ All four new parity comparisons for measure 5a and seven of 32 changes to measure 12c require creating new submeasures. All other changes to measures 5a and 12 were completed on time.

For your reference, the following submeasures will require new disaggregations:

- 5a UNE-P FW new and move orders, parity with ILEC fielded new and move orders
- 5a UNE-P FW change and conversion orders compared to ILEC fielded change orders
- 5a UNE-P NFW new and move compared to ILEC NFW new and move orders
- 5a UNE-P NFW change and conversion orders compared to ILEC NFW change orders
- 12c ISDN PRI No Dispatch parity with DDS
- 12c Analog Line Port Dispatch parity with VGPL
- 12c Analog Line Port No Dispatch parity with VGPL
- 12c Combined voice and data - dispatched, 9 hour benchmark
- 12c Combined voice and data - no dispatch, 9 hour benchmark
- 12c Optical loop - dispatched, diagnostic
- 12c Optical loop - no dispatch, diagnostic

Due to the imminent implementation date, SBC would appreciate your immediate attention to this matter. I am available to discuss this further if you have any questions regarding this request.

Sincerely,



Cc William Dever, WCB
Dennis Johnson, WCB
Pete Young, EB